



July 10, 2019

Reference No. 038443-111

Ms. Leslie Patterson
Remedial Project Manager
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Mail Code SR-6J
Chicago, Illinois
60604

Ms. Tamara McPeck
Environmental Response and Revitalization
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio
45402

Mr. Steve Renninger
On-Scene Coordinator
USEPA Region V
Emergency Response Branch
26 West Martin Luther King Drive
Cincinnati, Ohio
45268

Dear Ms. Patterson, Ms. McPeck, and Mr. Renninger:

**Re: Progress Report: June 1 through 30, 2019
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA] Docket No. V-W-16-C-011) effective June 11, 2016 (RI/FS ASAOC), and the ASAOC for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAOC), for the period of June 1 through 30, 2019.

The next Progress Report for the month of July 2019 will be submitted on or before August 10, 2019.



Significant Developments in this Reporting Period

RI/FS ASAOC Developments

Activities conducted in June 2019 are summarized below.

- The following general activities were completed:
 - On June 4, GHD received a letter from Ohio EPA dated May 30, 2019 regarding “Resolution of Violation for OAC 3745-9-03(B) and OAC 3745-9-03(C) - Improper Well Maintenance and Abandonment for South Dayton Dump and Landfill Site”, which concludes that the violation has been resolved.
- GHD received a letter from USEPA dated June 7, 2019 that provides USEPA comments on the Quarry Pond sampling results presented in GHD’s letter dated April 26, 2019.
- GHD submitted the updated Quality Assurance Project Plan (QAPP) with executed signature pages to USEPA on June 14, 2019.
- GHD and USEPA conducted follow-up activities associated with USEPA’s comments (received on May 9) regarding the updated Phase 1 soil gas investigation results (submitted on April 22, 2019), including the following:
 - GHD is reviewing possible alternate locations on Parcel 3256 for proposed soil gas probe GP36-18 due to access problems at the original proposed location (non-responsive)
 - GHD and USEPA participated in a telephone discussion on June 20 to clarify USEPA’s proposed alternative soil gas probe locations within the Dryden Road right-of-way (adjacent to Parcel 3061, which is occupied by Dayton Power & Light). GHD noted potential access issues associated with presence of overhead and buried utilities within the right-of-way. USEPA indicated that the sampling results from the new soil gas probes installed within the right-of-way would be used to determine the need for additional investigations within Parcel 3061. Discussions between Region 5 ORC and counsel to the Respondents are ongoing.
 - On June 21, USEPA provided a copy of the report entitled “Site Assessment Report for the South Dayton Landfill Site” prepared by Weston Solutions, Inc. dated October 29, 2012. The report includes information regarding soil gas probes (GP1 through GP7) installed by USEPA in 2012, which was requested by GHD.
- As recommended by GHD’s Phase 1 soil gas investigation results letter dated April 22, 2019, GHD provided the results of soil gas sampling conducted in 2018 to the property owners at (non-responsive) (via e-mail on June 24) and Jim City Salvage property (via e-mail on June 27). The communication with (non-responsive) included a request for access to collect an air sample beneath the residential structure on the property in accordance with GHD’s April 22, 2019 letter. Access by the property owner has been denied.
- GHD continued data validation and data assessment activities for analytical results for investigative samples (soil/fill, groundwater) collected through 2019.



Removal Action ASAOC Developments

On June 17 and 18, 2019, GHD completed sub slab depressurization system (SSDS) inspections at buildings with an operating system, including Buildings 8 and 9 – B&G Equipment and Truck Repair, Building 12 – Overstreet Painting and S&J Precision, Building 14 – NexGen Vending, Building 15 – SIM Trainer, Building 17 – D. Dickinson Construction (formerly Megacity Construction), and Building 24 – Globe Manufacturing. All systems were functioning normally.

GHD began preparations to conduct annual Vapor Intrusion (VI) proficiency sampling during the week of July 15 at the following locations: Buildings 8 and 9 – B&G Equipment and Truck Repair; Building 12 – Overstreet Painting and S&J Precision; Building 14 – NexGen Vending; and Building 15 – SIM Trainer. Annual methane monitoring is also required for Building 15.

Summaries of all Anticipated Problems and Planned Resolutions

Requests for site access to perform environmental sampling have not been granted by the following properties:

- Resident(s) at [redacted] non-responsive (no response)

GHD understands that USEPA has contacted the above-mentioned property owner regarding access but there has been no response, and USEPA does not plan to pursue this further. USEPA has requested that alternative locations be considered as noted above.

In addition, access to conduct air sampling at [redacted] non-responsive has been denied as noted above. GHD will attempt to discuss further with the property owner as soon as possible.

Projected Work for the Next Reporting Period

- GHD will continue scheduling and planning RI/FS activities in accordance with the approved work plan. The planned activities include:
 - Continue data validation and data assessment for investigative samples collected to date.
 - Preparation of Technical Memorandum for Soil/Fill and Soil Gas Investigation.
 - Preparation of Technical Memorandum for Groundwater Investigation.
- GHD will conduct follow-up activities with respect to the Phase 1 soil gas investigation. GHD will evaluate options for alternate locations for GP36-18, and will attempt further discussion with [redacted] non-responsive [redacted] non-responsive proposed air sampling.
- The Respondents and USEPA On-Scene Coordinator will continue to work together to implement the VI mitigation work plan. GHD will complete annual VI proficiency sampling at Buildings 8, 9, 12, 14 and 15, and annual methane monitoring at Building 15.



Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD

A handwritten signature in blue ink that reads "Julian Hayward". The signature is written in a cursive, flowing style.

Julian Hayward

JH/kf/21

Encl.

cc: (all by pdf) Ken Brown, ITW
Bryan Heath, NCR
Wendell Barner, Barner Consulting
Jim Campbell, EMI
Andrew Dorn, ITW
Scott Blackhurst, Kelsey Hayes Company
Michael Hughes, Neal, Gerber & Eisenberg
Wray Blattner, Thompson Hine
Larry Silver, Langsam Stevens Silver & Hollaender
Tim Hoffman, Dinsmore & Shohl
Brett Fishwild, Jacobs
Valerie Chan, GHD
Steve Quigley, GHD